

1 **JEFF LANDRY**
2 **ATTORNEY GENERAL OF LOUISIANA**
3 JOSEPH S. ST. JOHN (*pro hac vice pending*)
4 *Deputy Solicitor General*
5 LOUISIANA DEPARTMENT OF JUSTICE
1885 N. Third Street
Baton Rouge, LA 70804
Tel: (225) 485-2458
stjohnj@ag.louisiana.gov

6 BRADLEY A. BENBROOK (CA 177786)
7 STEPHEN M. DUVERNAY (CA 250957)
8 BENBROOK LAW GROUP, P.C.
400 Capitol Mall, Suite 2530
Sacramento, CA 95814
Tel: (916) 447-4900
brad@benbrooklawgroup.com
steve@benbrooklawgroup.com

9 *Counsel for the State of Louisiana*

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12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN JOSE DIVISION**

15 NATIONAL URBAN LEAGUE *et al*,

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17 Plaintiffs,

18 v.

19 WILBUR L. ROSS *et al*,

20 Defendants.
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No. 5:20-cv-05799-LHK

**DECLARATION OF JOSEPH S. ST. JOHN
ISO LOUISIANA AND MISSISSIPPI'S
MOTION TO SHORTEN RESPONSE
TIME AND TO EXPEDITE**

Judge: Hon. Lucy H. Koh
Action Filed: Aug. 18, 2020

DECLARATION OF JOSEPH S. ST. JOHN

I, Joseph Scott St. John, am employed by the Louisiana Department of Justice; I serve as counsel to the State of Louisiana in connection with the above-captioned matter. I make this declaration in support of Louisiana and Mississippi's Motion to Shorten Response Time and to Expedite. I am competent to testify as to the matters set forth herein.

1. I am informed and believe that the Louisiana Attorney General's Office first learned of this litigation, the TRO, and the TRO Extension on the afternoon of September 17, 2020.

2. Although Louisiana decided on September 17, 2020, that it likely needed to intervene to protect its interests, I recognized that drafting a Proposed Answer to Plaintiffs' 370 paragraph Amended Complaint, as required by Fed. R. Civ. P. 24, would require significant time.

3. I performed an initial review of the facts in this case, then researched and drafted a Notice of Intent to Intervene overnight on September 17-18, 2020 so as to timely alert the Court and the parties about Louisiana's interests and the impact of this litigation on those interests. That Notice was filed on the morning of September 18, 2020.

4. Attached hereto as Exhibit 1 is a true and accurate copy of email correspondence between counsel regarding Louisiana's contemplated Motion to Intervene and Motion to Shorten Time and Expedite.

5. As of 5:30 p.m. Central Time, Counsel for Plaintiffs has not responded to Louisiana's offer to meet-and-confer telephonically.

6. Further declarant sayeth naught.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA AND THE STATE OF LOUISIANA THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in New Orleans, Louisiana this 23rd day of September 2020.

/s/ Joseph S. St. John
